

US DISTRICT COURT  
WESTERN DIST ARKANSAS  
FILED

FEB 25 2016

DOUGLAS F. YOUNG, Clerk  
By <sup>Deputy Clerk</sup>  
PLAINTIFF

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF ARKANSAS  
TEXARKANA DIVISION

PAULA YORK

V.

CASE NO. 16-4018

GREGORY ALEXANDER &  
NATIONAL DISTRIBUTORS LEASING, INC.

DEFENDANTS

NOTICE OF REMOVAL

Comes now the Separate Defendant, National Distributors Leasing, Inc.  
(NDL), and for its removal of this action pursuant to 28 U.S.C. § 1441, et seq.,  
states:

1. On or about December 8, 2015, a civil action was commenced against  
Defendants in the Circuit Court of Hempstead County, Arkansas, Civil Division –  
1st, styled Paula York v. Gregory Alexander and National Distributors Leasing, Inc.,  
Case No. 29CV-15-174-1.

2. NDL received service of copies of the Summons and Complaint in this  
action on January 26, 2016.

3. As far as is known, Separate Defendant Gregory Alexander has not yet  
been served with the Summons and Complaint.

4. Separate Defendant Gregory Alexander has been contacted and consents  
to the removal of this case.

5. Attached hereto are the following documents which comprise of all of

the process, pleadings, orders, or other filings in the Hempstead County Circuit Court action:

- A. Summons;
  - B. Complaint; and
  - C. Affidavit of Service.
6. Plaintiff is a resident and citizen of the State of Arkansas.
  7. NDL is incorporated in and has its principal place of business in Indiana
  8. Separate Defendant Gregory Alexander is an individual resident and citizen of Indiana.
  9. There is complete diversity of citizenship between Plaintiff and both Defendants.
  10. The amount in controversy exceeds \$75,000.
  11. This Court has original jurisdiction pursuant to 28 U.S.C. § 1332.
  12. This Court has removal jurisdiction under 28 U.S.C. § 1441(a).
  13. This Notice of Removal is filed within thirty days of the service of the Complaint and Summons upon either Defendant. The action is therefore properly removed pursuant to 28 U.S.C. § 1446.
  14. NDL has this date given written notice of the filing of this notice to Plaintiff as required by 28 U.S.C. § 1446(d) and to the Circuit Clerk of Hempstead County, Arkansas, as required by 28 U.S.C. § 1446(d).

WHEREFORE, Separate Defendant, National Distributors Leasing, Inc.,

requests that this action proceed in this Court on the basis of this removal, that the Court assume jurisdiction of this case through resolution, and for such other further relief as authorized at law.

WATTS, DONOVAN & TILLEY, P.A.  
200 RIVER MARKET AVENUE, SUITE 200  
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(501) 372-1406  
(501) 372-1209 FAX

By:   
DAVID M. DONOVAN (81184)

**CERTIFICATE OF SERVICE**

I, David M. Donovan, hereby certify that a copy of the above and foregoing pleading was mailed to all attorneys of record as listed below this 24 day of February, 2016.

Kale L. Ludwig  
Ludwig Law Firm  
1 Three Rivers Dr.  
Little Rock, AR 72223

  
DAVID M. DONOVAN